

28 January 2025

Electricity Authority
Level 7 AON Centre
1 Willis Street
Wellington 6011

ccc@ea.govt.nz

**Consultation Paper: Proposed Electricity Information Exchange Protocol – EIEP4A:
Medically Dependent Consumer Information**

Joint submission by Marlborough Lines Limited and MainPower New Zealand Limited

Marlborough Lines Limited (MLL) and MainPower New Zealand Limited (MPNZ) thanks the Electricity Authority for the opportunity to make this joint submission.

Nothing in this submission is sensitive and the whole submission can be published.

Please do not hesitate to contact me should you have any questions regarding this submission.

Yours faithfully



Scott Wilkinson
Commercial Manager
Marlborough Lines Limited
e-mail: scott.wilkinson@mll.co.nz

Submitter**Marlborough Lines Limited and MainPower New Zealand Limited**

Questions	Comments
Q1. Do you agree that introducing a regulated EIEP4A will address the issues with EIEP4 described above in 2.6?	<p>Perhaps. However, a more efficient and effective solution would be to regulate the existing EIEP4 file.</p> <p>If there are genuine concerns with inconsistent application, irrelevant data, or delayed or outdated data, then specifying data requirements, timeframes etc. through regulating the existing EIEP4 would resolve these issues.</p> <p>Many Distributors already have the requirement to submit EIEP4 files in their DDAs so retailers are already capable of meeting delivery of these files.</p>
Q2. If you are a retailer or distributor, does limiting the data provided in the proposed EIEP4A to only medically dependant status at the ICP level meet your operational needs? If not, what additional data would you suggest?	<p>If an EIEP4A file is introduced, Distributors will still require an EIEP4. Having consumer data in two separate files adds complexity and will likely result in additional cost to have systems amended to accommodate new data files.</p>
Q3. Should the use of the EIEP transfer hub be mandatory?	<p>Yes</p>
Q4. Do you agree with the objective of the proposed form? If not, why not?	<p>We agree with the objective to ensure the consistent, reliable and timely exchange of information about MDCs, however, do not agree with this being in a standalone EIEP4A when it could be managed through the existing EIEP4.</p> <p>If EIEP4 has been ruled out as an option for this, as the Consultation Paper states, then as per our response to Q9., it would be helpful to understand the reasons why regulating EIEP4 has been ruled out.</p> <p>If Distributors are required to notify consumers of outages, they still need the EIEP4, so would require management of two separate files with relevant information.</p> <p>There is no mention of removing the Disconnection Restriction and the Medical Restriction Type fields from the current EIEP4 spec if the EIEP4A is introduced. This means there will be two fields provided called disconnection restriction, coming from two different files, with two different definitions.</p>

	<p>There will also be two fields called Medical Restriction Type coming from two different sources with different definitions.</p> <p>If the EIEP4A is going to be introduced, the fields need to be removed from the EIEP4 as even though this is unregulated (and it is assumed will remain so if the EIEP4A is introduced) many Distributors have mandated provision of EIEP4 files in their DDA so rely upon this specification being fit for purpose.</p>
<p>Q5. Have we identified all the main costs and benefits? If not, what are we missing?</p>	<p>In our view, the benefits set out in 3.5 could be realised through inclusion of this information in and the regulation of EIEP4.</p> <p>Could the Obligations not be met under a regulated EIEP4 file, and potentially costs associated with initial set up of delivering and receiving a new EIEP file be avoided, as well as one less EIEP4 file to comply with? As noted above, retailers already (under most DDAs) deliver EIEP4 files.</p> <p>Missing from the consultation is a quantitative estimate of costs and benefits – it is difficult to see how the Authority has reached the conclusion that benefits outweigh the costs, when no quantitative values are included.</p>
<p>Q6. Do you agree the benefits of the proposed amendment outweigh its costs?</p>	<p>As above, we are not able to agree without understanding the quantitative estimate of costs and benefits.</p>
<p>Q7. Does the proposal adequately address privacy concerns? If not, what additional safeguards should be included?</p>	<p>Unsure – Distributors hold ICP and consumer information together in a system. If Distributors are undertaking outage notifications, they need contact details of the consumer, the ICP identified itself would not suffice. The EIEP4A just limits information within that file, but the information (customer information) still remains in the EIEP4 so it is not clear how privacy concerns are addressed through introduction of the EIEP4A.</p>
<p>Q8. Do you foresee any practical or technical challenges with implementing ICP-only data exchanges? If so, what mitigations would you propose?</p>	<p>No response.</p>
<p>Q9. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms</p>	<p>We disagree – Mandating EIEP4 and updating the business specification to tighten the definitions, delivery mechanisms and time frames would be preferable. This will mean Distributors can be more reliant on the consistency and accuracy of consumer information provided by Retailers, at present, because EIEP4 is not mandated, Distributors often find data to be out of date, inconsistently delivered,</p>

<p>consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.</p>	<p>and/or inaccurate. Distributors must spend time verifying the information as a result, which is inefficient.</p> <p>The definitions in the two file types (EIEP4 and the proposed EIEP4A conflict). This could cause issues if the dual file structure is adopted and the duplicate fields aren't removed from the EIEP4.</p> <p>The EIEP4A specification also is not specific enough on timeframes. It does not state the timeframe withing which updates must be provided to Distributors. How many days after they become aware of a change must they send an updated file?</p> <p>The consultation paper states that "The Authority has assessed this option considering recent feedback received via the August consultation and has formed the view this option is not suitable." From this statement, it is not clear why the Authority has formed that view.</p>
--	---